

STEPHEN P. BLAKE (SBN 260069)
 SIMPSON THACHER & BARTLETT LLP
 2475 Hanover Street
 Palo Alto, CA 94304
 Telephone: (650) 251-5000
 Facsimile: (650) 251-5002
 Email: sblake@stblaw.com

JONATHAN K. YOUNGWOOD (admitted *pro hac vice*)
 NICHOLAS S. GOLDIN (admitted *pro hac vice*)
 SIMPSON THACHER & BARTLETT LLP
 425 Lexington Avenue
 New York, NY 10017
 Telephone: (212) 455-2000
 Facsimile: (212) 455-2502
 Email: jyoungwood@stblaw.com
 ngoldin@stblaw.com

Attorneys for Director Defendants
(additional counsel for other Defendants listed on
signatures page)

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

IN RE PG&E CORPORATION SECURITIES
 LITIGATION

) Case No. 5:18-cv-03509-EJD

) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING BRIEFING**
) **SCHEDULE ON MOTION TO**
) **INTERVENE**

) Judge: Hon. Edward J. Davila

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on February 15, 2023, certain members of the putative class in the above-captioned action (the “Movants”) filed a Motion to Intervene in this action (the “Motion”) [Dkt. No. 229];

WHEREAS, any response to the Motion is currently due on March 1, 2023, any reply in support of the Motion is currently due on March 8, 2023, and the hearing on the Motion is currently set for June 29, 2023;

WHEREAS, on February 6, 2023, Movants filed a Motion to Enforce the Order Approving Securities ADR and Related Procedures For Resolving Subordinated Securities Claims in the bankruptcy action captioned *In re PG&E Corporation, et al.*, No. 19-30088 (the “Bankruptcy Motion”);

WHEREAS, the parties have agreed to a brief extension of the opposition and reply deadlines on the Motion until after the March 7, 2023 hearing on the Bankruptcy Motion;

WHEREAS, no previous time modifications have been entered with regard to the Motion, and this extension will not affect any other deadlines this action, which is currently stayed.

NOW, THEREFORE, the parties hereby stipulate and agree as follows:

- (1) Any response(s) to the Motion shall be filed by March 14, 2023;
- (2) Any reply in support of the Motion shall be filed by March 28, 2023.

//

//

//

//

//

//

//

//

//

Date: February 27, 2023

ROLNICK KRAMER SADIGHI LLP

By: /s/ Lawrence M. Rolnick

Lawrence M. Rolnick (pro hac vice)

Marc B. Kramer (pro hac vice)

Michael J. Hampson (pro hac vice)

Jeffrey A. Ritholtz (pro hac vice)

Frank T.M. Catalina (pro hac vice)

1251 Avenue of the Americas

New York, NY 10020

Telephone: (212) 597-2800

Facsimile: (212) 597-2801

lrolnick@rksllp.com

mkramer@rksllp.com

mhampson@rksllp.com

jritholtz@rksllp.com

fcatalina@rksllp.com

THE LONG LAW FIRM, PLLC

James A. Long, CSB No. 326404

8605 Santa Monica Blvd.

PMB 48629

West Hollywood, California 90069-4109

(315) 991-8000 Telephone

jlong@long.law

Attorneys for the Movants

DAVIS POLK & WARDWELL LLP

/s/ Neal A. Potischman

Neal A. Potischman (SBN 254862)

1600 El Camino Real

Menlo Park, California 94025

Telephone: (650) 752-2000

Facsimile: (650) 752-2111

Email: neal.potischman@davispolk.com

Charles S. Duggan (admitted *pro hac vice*)

Dana M. Seshens (admitted *pro hac vice*)

Craig T. Cagney (admitted *pro hac vice*)

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ Thomas A. Dubbs

Thomas A. Dubbs (pro hac vice)

Carol C. Villegas (pro hac vice)

Michael P. Canty (pro hac vice)

Charles J. Stiene (pro hac vice)

140 Broadway

New York, NY 10005

212-907-0700

tdubbs@labaton.com cvillegas@labaton.com

mcanty@labaton.com

cstiene@labaton.com

Lead Counsel for Lead Plaintiff-Appellant

PERA and the Class

SIMPSON THACHER & BARTLETT LLP

/s/ Stephen P. Blake

Stephen P. Blake (SBN 260069)

2475 Hanover Street

Palo Alto, CA 94304

Telephone: (650) 251-5000

Facsimile: (650) 251-5002

Email: sblake@stblaw.com

Jonathan K. Youngwood (admitted *pro hac vice*)

Nicholas S. Goldin (admitted *pro hac vice*)

425 Lexington Avenue

New York, NY 10017

Telephone: (212) 455-2000

Facsimile: (212) 455-2502

Email: jyoungwood@stblaw.com

ngoldin@stblaw.com

Attorneys for Defendant Directors Barbara L. Rambo, Lewis Chew, Fred J. Fowler, Richard C. Kelly, Roger H. Kimmel, Richard A. Meserve, Forrest E. Miller, Maryellen C. Herring, Barry Lawson Williams, Rosendo

450 Lexington Avenue
 New York, New York 10017
 Telephone: (212) 450-4000
 Facsimile: (212) 701-5800
 Email: charles.duggan@davispolk.com
 dana.seshens@davispolk.com
 craig.cagney@davispolk.com

G. Parra, Anne Shen Smith and Eric D. Mullins.

Attorneys for Defendant Underwriters Barclays Capital Inc., BNP Paribas Securities Corp., Morgan Stanley & Co. LLC, MUFG Securities Americas, Inc., The Williams Capital Group, L.P., Citigroup Global Markets Inc., J.P. Morgan Securities LLC, Merrill Lynch, Pierce, Fenner & Smith Incorporated (n/k/a BofA Securities, Inc.), Mizuho Securities USA LLC, Goldman, Sachs & Co., LLC, RBC Capital Markets, LLC, Wells Fargo Securities, LLC, BNY Mellon Capital Markets, LLC, TD Securities (USA) LLC, C.L. King & Associates, Inc., Great Pacific Securities, CIBC World Markets Corp., SMBC Nikko Securities America, Inc., U.S. Bancorp Investments, Inc., Mischler Financial Group, Inc., Blaylock Van, LLC, Samuel A. Ramirez & Company, Inc., and MFR Securities, Inc. (but not Lebenthal & Co. LLC, which has not appeared in this action)

McDERMOTT WILL & EMERY LLP

/s/ Steven S. Scholes

Steven S. Scholes (admitted *pro hac vice*)
 444 West Lake Street
 Chicago, IL 60606
 Telephone: (312) 372-2000
 Facsimile: (312) 984-7700
 Email: sscholes@mwe.com

Jason D. Strabo (SBN 246426)
 2049 Century Park East, Suite 3200
 Los Angeles, CA 90067
 Telephone: (310) 277-4110
 Facsimile: (310) 277-4730
 Email: PG&E@mwe.com

Attorneys for Officer Defendants Anthony F. Earley, Jr., Geisha J. Williams, Nickolas Stavropolous, Julie M. Kane, Christopher P. Johns, Patrick M. Hogan, David Thomason, and Dinyar Mistry

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2023

Edward J. Davila
United States District Judge